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February 18, 2022

VIA E-FILE

The Honorable Joanna Seybert
Alfonse M. D'Amato Federal Building
United States District Court
100 Federal Plaza, Courtroom 1030
Central Islip, New York 11722

Re: *Andrew Perrong and Stewart Abramson v. Charles Baratta LLC et al.*
Civil Action No: 2-21-CV-00996-JS-AYS

Dear Judge Seybert:

We are counsel for Defendants Charles Baratta LLC, Krause and Kinsman Law, Lerner & Rowe, PC, Arkady Frekhtman Attorney at Law PC, Reliable Legal Marketing Consulting, LLC, and Gacovino, Lake & Associates, P.C. in the above-captioned lawsuit. We write, jointly with counsel for Plaintiffs Andrew Perrong and Stewart Abramson, to inform the Court that the parties have agreed to engage a private mediator to work cooperatively toward settlement.

The parties are in the process of engaging the services of an experienced mediator. By February 23, 2022, the parties will provide a status update informing the Court of the engaged mediator and scheduled mediation date.

In the interest of judicial efficiency, the parties request that the Court stay the scheduled deadlines in this action. Specifically, the parties request an adjournment of the dispositive motion briefing deadlines. (*See* Doc. 79.) This request is brought in good faith and not for undue delay. A stay is an efficient way to preserve the Court's resources while the parties mediate, and avoid potentially unnecessary fees and costs by the parties.

The parties are willing, upon the Court's direction, to submit a status report to the Court, informing the Court of the parties' progress on mediation.

We thank the Court for its time and attention to this matter.

Sincerely,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

A handwritten signature in blue ink that reads 'Laura E. Kogan'.

Laura E. Kogan